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20 Sony Corporation of America

21
22 UNITED STATES DISTRICT COURT
23
24 NORTHERN DISTRICT OF CALIFORNIA

25 GREGORY BENDER) Case No. 09-CV-01246-CRB
26 Plaintiff,)
27 v.)
28 SONY CORPORATION OF AMERICA, a New) **STIPULATION AND [PROPOSED]**
29 York corporation,) **ORDER TO EXTEND TIME TO**
30 Defendant.) **RESPOND TO AMENDED**
31) **COMPLAINT**

32
33 **RECITALS**

34 WHEREAS, the Complaint of Plaintiff Gregory Bender (“Plaintiff”) in this action was
35 filed on or about March 23, 2009;

36 WHEREAS, the Amended Complaint of Plaintiff in this action was filed on or about May
37 20, 2009;

WHEREAS, Defendant Sony Corporation of America's ("Sony's") response to Plaintiff's Amended Complaint is due on September 8, 2009;

WHEREAS, Plaintiff has stated that it intends to file a motion to file a Second Amended Complaint;

WHEREAS, this extension will provide time for Plaintiff to prepare and file its Motion to File a Second Amended Complaint; and

WHEREAS, this additional time will not interfere with any other deadlines set by the Court in this matter.

STIPULATION

Pursuant to Local Rule 6-1(a), IT IS HEREBY STIPULATED AND AGREED by the parties, through their counsel, that the time within which Sony shall be required to file its answer, motion, counterclaim, cross-claim and/or other responses to Plaintiff's Amended Complaint in this action shall be extended to and including September 16, 2009 or such other time as may be required to respond to a Second Amended Complaint if allowed by the Court.

APPROVED AS TO FORM AND CONTENT

DATED: September 8, 2009

STEVEN M. BAUER
MICHAEL A. FIRESTEIN
JACOB K. BARON
PROSKAUER ROSE LLP

/S/ Jacob K. Baron
Jacob K. Baron

Attorneys for Defendant,
Sony Corporation of America

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2 DATED: September 8, 2009
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DAVID N. KUHN

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/s/ David N. Kuhn

DAVID N. KUHN

Attorney for Plaintiff,
Gregory Bender

1 DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B
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3 I, Jacob K. Baron, hereby declare pursuant to General Order 45, § X.B, that I have
4 obtained the concurrence on the filing of this document from the all the signatories listed above.

5 I declare under penalty of perjury that the foregoing declaration is true and correct.
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7 DATED: September 8, 2009
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9 /s/ Jacob K. Baron
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11 Jacob K. Baron
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~~— [PROPOSED] ORDER~~

Having considered the foregoing Stipulation, and good cause appearing,

3 (1) The time within which Sony shall be required to file its answer, motion,
4 counterclaim, cross-claim and/or other response to Plaintiff's Amended Complaint in this action
5 shall be extended to and including September 16, 2009.

IT IS SO ORDERED

DATED: September 10, 2009

